



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF REGIONAL OFFICES  
SUFFOLK REGIONAL OFFICE

April 1, 2019

**ORIGINAL FILED BY ECF**

Honorable A. Kathleen Tomlinson  
Magistrate Judge  
United States District Court  
Eastern District of New York  
Long Island Courthouse  
100 Federal Plaza  
Central Islip, New York 11722

Re: Doe v. Haas  
19 CV 00014 (DRH) (AKT)

Dear Magistrate Judge Tomlinson:

This office represents the State defendants in the above-referenced action. I am in receipt of both the Amended Complaint, filed on March 20, 2019, as well as of your Order directing submission of a discovery plan in advance of a conference on April 2, 2019. The parties have conferred and it is respectfully requested by all the parties that discovery be stayed until April 9, 2019 pending submission of defendants' anticipated request for permission to move to dismiss the Amended Complaint. This request was made on March 29, 2019 to Judge Hurley, who denied it as it should have been made in the first instance to Your Honor.

As all of the appropriate grounds to be argued in such a motion are still being reviewed for inclusion in my anticipated letter, we would request a stay for this brief period, and, if warranted, seek a further stay in my letter requesting permission to move to dismiss.

Thank you for your consideration of this matter.

Respectfully,  
s/

SUSAN M. CONNOLLY (SMC/2599)

SMC/smc

cc: BY ECF:  
Stanislav Gomberg, Esq.

Gomberg Legal, P.C.  
1001 Avenue of the Americas, Suite 1222  
New York, New York 10018